

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:20-cr-00318-SEP-DDN
)
MICHAEL THOMAS,)
a/k/a, "Ba Ba,")
)
Defendant.)

SUPPLEMENTAL MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Donald S. Boyce, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with being a Felon in Possession of a Firearm in violation of 18 U.S.C. §922(g)(1), an offense for which a maximum 10-year imprisonment is prescribed under Title 18.
2. According to St. Louis Metropolitan Police Report #20-017833, on April 26, 2020, police responded to investigate a shooting on Cass Ave., near the O'Fallon Place Apartments. Police spoke with the apparent intended victim, who said that he was driving his car out of the apartment complex onto Cass when a car drove up next to his and the occupants fired several shots into his car. Police saw that the victim's car had been struck by multiple bullets. Police also interviewed a second, apparently unintended victim, who said that she was driving her car in the area when she

heard shots and was struck in the arm by a bullet. Police reviewed recordings from multiple security cameras in the area and saw that a blue Ford sedan had been used in the shooting. Police reviewed additional recordings, including from a camera on the parking lot of a nearby gas station. Police saw that minutes before the shooting, a person later identified as the defendant was in the blue Ford at the gas station. Police received a search warrant at the Defendant's house. The Defendant was stopped in a car nearby prior to the execution of the search warrant. The defendant was wearing a holster, and a pistol was recovered from inside the car. Police then executed the search warrant and recovered four more guns from inside his house.

3. A review of the Defendant's criminal history shows that he has prior felony convictions for serious violent crimes, including forcible rape, forcible sodomy, robbery, and armed criminal action.

4. Based on the statutory factors in 18 U.S.C. § 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with a firearm offense. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant, as summarized above, is strong. Pursuant to Section 3142(g)(3)(A), the Defendant's criminal history includes multiple prior felony convictions for serious offenses.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Donald S. Boyce
DONALD S. BOYCE, #6282562IL
Assistant United States Attorney